

Martin W. Chow, Esq. (MC2013)
 Law Offices of Martin W. Chow, LLC
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 - and -
 2861 Royle Street
 Bellmore, NY 11710

FILED
 IN CLERK'S OFFICE
 U.S. DISTRICT COURT E.D.N.Y.

★ JUN 06 2011 ★

BROOKLYN OFFICE

Attorneys for the Plaintiff

UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF NEW YORK

WEIFANG XINLI PLASTIC PRODUCTS
 CO. LTD,

Plaintiff,)
 -against-) **COMPLAINT**
 JBM TRADING INC., CHAO MING ZHEN)
 a/k/a KEVIN M. ZHEN,) **Index No.:** CANTRELL, R.
 Defendants.)

The Plaintiff, WEIFANG XINGLI PLASTIC PRODUCTS CO. LTD, by its
 attorneys, The Law Offices of Martin W. Chow, LLC as and for its Complaint, alleges as
 follows:

JURISDICTION

1. At all relevant times herein, the plaintiff, has been and still is
 a limited liability company with a principal place of business in Weifang, Shandong
 province, Peoples Republic of China ("PRC").

2. At all relevant times herein, the defendant JBM TRADING INC. (hereinafter "JBM") is a corporation organized under the laws of the State of New York, with a former principal place of business at: 1643 74th Street, 1st Floor, Brooklyn, NY 11204.

3. At all relevant times herein, defendant CHAO MING ZHEN a/k/a KEVIN M. ZHEN (sometimes hereinafter referred to as "ZHEN") is an individual with a current residence at: 6 Hilton Court, Hicksville, NY 11801.

4. This court has jurisdiction based on 28 U.S.C. §1332(a)(2) and (c)(1) diversity of citizenship and the amount in controversy exceeds \$75,000.00.

5. Venue is based on 28 U.S.C. §1391(a)(2).

I. BREACH OF CONTRACT

AS AND FOR A FIRST CAUSE OF ACTION

6. Beginning on or about April 29, 2010 and on various dates thereafter, the plaintiff sold and delivered to the defendant JBM, at defendant Zhen's specific instance and request, certain plastic bags, as evidenced by purchase orders, sales confirmations, packing lists, invoices and bills of lading as more particularly set forth in Exhibit A attached herewith, together with a schedule for each shipment, showing the purchase order number, item number, purchase order date, shipment quantity, description of goods shipped, dollar value of each shipment, invoice number, invoice date, payment due, payment amount and payment date, for the original agreed price and reasonable value of \$200,693.49, of which the said sum has been duly demanded by the plaintiff, but to date remains unpaid, and is more particularly set forth in Exhibit "A" attached hereto.

II. BOOK ACCOUNT

AS AND FOR A SECOND CAUSE OF ACTION

7. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1-6 as if the same were repeated verbatim herein.
8. Beginning on or about April 29, 2010, plaintiff rendered to the defendant JBM certain statements of account specifying the payments due and owing and defendant JBM retained the same without objection.

9. To date, the defendant JBM has failed to pay the plaintiff the agreed upon sum of \$200,693.49, plus interest, on an account had and stated, for goods sold and delivered to defendant by the plaintiff.

III. INSOLVENCY – PIERCING THE CORPORATE VEIL

AS AND FOR A THIRD CAUSE OF ACTION

10. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1-9 as if the same were repeated verbatim herein.
11. On information and belief, defendant Zhen is the chief operating officer, sole shareholder, owner and employee of the defendant JBM.
12. On information and belief, prior to ordering goods from the plaintiff on or about April 29, 2010, the defendant Zhen owned, operated and established two other corporations whose primary business was the sale of plastic bags – the same as defendant JBM.

13. On information and belief, the names of those two other businesses that were owned, operated and controlled by the defendant Zhen were: KEVIN MULTILINE POLYMER INC. and K.M. PACKAGING INC.

14. On information and belief, all three corporations, to wit: Kevin Multiline Polymer Inc., K.M. Packaging Inc. and the defendant JBM, conducted the same type of business - i.e. sales of plastic bags, and operated out of the same or similar office location, used the same or similar telephone, facsimile and cell phone numbers, the same email addresses and had the same or substantially the same officers, directors and employees.

15. On information and belief, and on or about August 6, 2009, at the time the defendant Zhen caused the defendant JBM to be organized, Zhen's two other corporations – Kevin Multiline Polymer Inc. and K.M. Packaging Inc. owed a combined total debt of at least \$488,711.00 to one creditor, H.K. Huilin International Trade Co. Ltd - a sum far in excess of their respective abilities to pay their bills as they became due, thus rendering them technically insolvent. Copies of the New York Secretary of State, Division of Corporation's records of incorporation for K.M. Packaging Inc. and Kevin Multiline Polymer Inc., dated March 22, 2004 and August 3, 2006, respectively, and their respective amounts due, on information and belief, to H.K. Huilin International Trade Co. Ltd are attached hereto as Exhibit "B".

16. On information and belief, defendant Zhen conducted the same line of business – to wit: the sale of plastic bags – with plaintiff through Kevin Multiline Polymer Inc. and K.M. Packaging Inc prior to establishing JBM and, following establishing JBM, conduct such business through defendant JBM, in each case, with

defendant Zhen acting as the sole representative of the corporations and in all respects other than name the operations being conducted in the same manner.

17. On information and belief, on or about August 6, 2009, defendant Zhen ceased operations of his two insolvent corporations – Kevin Multiline Polymer Inc. and K.M. Packaging Inc., and caused to be organized the defendant JBM , as a “new corporation” – stripped of any debt, but also with little or no capital to operate its business. A copy of the New York Secretary of State, Division of Corporation’s records of incorporation for JBM Trading Inc. dated August 6, 2009, is attached hereto as Exhibit “C”.

18. On information and belief, the sole and/or principal purpose of Zhen’s establishing JBM was for the purpose of avoiding and not paying the corporate debts of Kevin Multiline Polymer Inc. and K.M. Packaging Inc., but continuing in the same line of business, to wit: sale of plastic bags – with little or no operating capital. In effect, Zhen failed to operate the three companies as separate entities with distinct corporate identifies and the purpose of forming such entities was to perpetuate a fraud on trade creditors including plaintiff.

19. Based on the foregoing, the corporate veil of JBM should be pierced such that all of the debts of JBM should be assumed by defendant Zhen; in particular, Zhen should be held personally liable for the corporate debts of defendant JBM in the amount \$200,693.49, because Zhen dominated and controlled all three corporations for his own personal benefit.

IV. BREACH OF FIDUCIARY DUTY

AS AND FOR A FOURTH CAUSE OF ACTION

20. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1-19 as if the same were repeated verbatim herein.

21. Because defendant JBM was insolvent and owed a fiduciary duty to its creditors not to sell, transfer, dissipate or waste corporate assets to the detriment of its creditors, the distribution, use or disposal of the plastic bags delivered by plaintiff to JBM or the monies received therefor constitutes a breach of defendant JBM's and defendant Zhen's fiduciary duty.

22. Consequently, on information and belief and in breach of its fiduciary duty, defendant JBM took corporate assets, including proceeds from the sale of goods obtained from plaintiff and paid defendant Zhen a salary, draw or other form of compensation or distribution; and on or about November 17, 2009, the defendant Zhen purchased real property, located at: 6 Hilton Court, Hicksville, NY, for a purchase of price of approximately \$444,000 and continues to pay a mortgage.

23. As a direct and proximate cause of such breach of fiduciary duty the defendant JBM has no assets and/or is unable to pay the plaintiff the amount it is owed and still due by the defendant JBM in the sum of \$200,693.49.

24. On information and belief, the defendant JBM has been paying and still continues to pay the defendant Zhen a draw, salary or other form of compensation.

V. FRAUD – REASONABLE ATTORNEYS’ FEES

AS AND FOR A FIFTH CAUSE OF ACTION

25. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1-24 as if the same were repeated verbatim herein

26. The formation of a new corporation – JBM, by the defendant Zhen, in August 2009, in which the defendant Zhen, was the sole and/or or principal shareholder, officer and director, was done for the sole and/or principal purpose of avoiding payment to one or more creditors of defendant Zhen’s corporations.

27. Such conduct constituted a “badge of fraud” under the Uniform Fraudulent Conveyance Act, as adopted in New York, Debtor Creditor Law, §§ 270-281, in that defendant Zhen had the specific intent to delay, defraud and/or hinder paying defendant Zhen’s and defendant Zhen’s corporation’s, including defendant JBM.

28. Such conduct was made when Zhen’s two other corporations, Kevin Multiline Polymer Inc and K.M. Packaging Inc were insolvent, and unable to pay their debts, generally, on a timely basis to there creditors.

29. Such formation of defendant JBM was made when Zhen knew or should have known that JBM had debts or was about to incur debts it would be unable or unwilling to pay, including those debts incurred or about to be incurred and owed to the plaintiff in the amount of \$200,693.49 in about April 2010, only 8 months after defendant JBM was formed by defendant Zhen in August 2009.

30. As such, any monies paid by defendant JBM to the defendant Zhen in the form of salary, distribution, dividends or other form of compensation was tantamount to a fraudulent conveyance of money or other assets from the defendant JBM to the

defendant Zhen. The fraudulent conveyance was made at a time when the defendant JBM was insolvent or rendered insolvent.

31. Such transfer or conveyance of monies to defendant Zhen was made without fair consideration. Such transfer or conveyance was made at a time when JBM knew or should have known that it had debts or would incur debts in excess of its potential or ability to pay, including the plaintiff in the amount of \$200,693.49.

32. Such transfer or payment to Zhen was made for the specific purpose of hindering, delaying and defrauding JBM creditors, including, but not limited to the plaintiff of its money due and owing in the amount of \$200,693.49.

33. Based on the foregoing, in addition to the payment of \$200,693.49, plaintiff is entitled to recover reasonable attorneys fees pursuant to New York Debtor Creditor Law §276-a as a result of such fraudulent conveyance by defendant JBM.

VI. BREACH OF BCL §§ 510, 719 and 720

AS AND FOR A SIXTH CAUSE OF ACTION

34. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1-33 as if the same were repeated verbatim herein.

35. Such transfer or conveyance was in effect an illegal and/or improper distribution or dividend made to the principal shareholder and officer of JBM, namely, Zhen, at a time when the defendant JBM was insolvent or rendered insolvent by such transfer and in violation of New York BCL §§ 510, 719, 720.

36. Pursuant to New York Business Corporation Law §720, Action Against

Directors and Officers for Misconduct, the defendant Zhen was the sole and/or principal officer of JBM who, aided and abetted in the fraudulent transfer of corporate assets, and failed to account for the corporate assets.

37. Based on the foregoing, the plaintiff, Weifang is entitled to recover from defendants, JBM and Zhen, individually, including reasonable attorneys fees pursuant to New York Debtor Creditor Law §276(a).

WHEREFORE, the plaintiff demands judgment as follows:

- 1) Against the defendant JBM on the FIRST AND SECOND CAUSES OF ACTION, for breach of contract and on a book account each in the sum of \$200,693.49 plus interest from April 29, 2010 to April 29, 2011 of \$18,062 for a total due in the amount of \$218,755 plus costs and reasonable attorneys fees; and
- 2) Pierce the corporate veils of defendant JBM; and hold the defendant Zhen personally liable for the debt owed by JBM to plaintiff on the THIRD CAUSES OF ACTION;
- 3) Against the defendant Zhen for breach of fiduciary duty in the amount of \$200,693 on the FOURTH CAUSE OF ACTION;
- 4) On the FIFTH CAUSE OF ACTION, against defendant Zhen in the amount of \$200,693 for fraud and reasonable attorneys' fees;
- 5) Against the defendant Zhen on the SIXTH CAUSE OF ACTION, for violation of BCL §§ 510, 719 and 720 in the amount of \$200,693 plus interest from April 29, 2010 to April 29, 2011, of \$18,062 for a total of \$218,755 plus costs; and

for such other and further relief this court deems just and proper.

Dated: April 8, 2011
New York, NY

Yours, etc.
Law Offices of Martin W. Chow, LLC.

By: Martin W. Chow
Martin W. Chow, Esq.
665 Newark Avenue, Suite 407
Jersey City, NJ 07306
NY Tel: (212) 233-3700
NJ Tel: (201) 963-9218
-and -
2861 Royle Street
Bellmore, NY 11710
Tel: (917) 968-2559
Fax: (646) 365-1256

To: Kevin M. Zhen a/k/a
Chao Ming Zhen
6 Hilton Court.
Hicksville, NY

Exhibit “A”

TABLE OF SHIPMENTS TO JBM TRADING INC. PURSUANT TO 3016(f)

濰坊鑫利塑料制品有限公司
WEIFANG XINLI PLASTIC PRODUCTS CO., LTD

Add: Yangjiabu Hanting Borough Weifang Shandong China

Tel: 0086 536 7263208 Fax: 0086 536 7263209

E-mail: wfjinli@sina.com Post: 261100

www.english-test.net | 2000-2010

INVOICE

TO:

INVOICE NO: XL100408

JBM TRADING, INC

手册: C42060350111

核销单: 748463633

DATE: 2010-4-29

SHIPPED FROM QINGDAO, CHINA TO NEW YORK, NY

SAP CODE	STOCK DESCRIPTION	CARTON QUANTITY	PRICE PER CARTON (USD\$)	ITEM TOTAL USD\$
	PLASTIC BAGS 12"X20" ROLL BAGS NET WEIGHT:11.00LB	4157	8.230	\$34,212.11

CONTAINER AND SEAL NO.:

UESU4180064 / EMCHEV1948

1X40' B/L No.: 140000328605

VESSEL / VOY : EVER REFINE V. 0430-081E

潍坊鑫利塑料制品有限公司
WEIFANG XINLI PLASTIC PRODUCTS CO., LTD

Add: Yangjiabu Hanting Borough Weifang Shandong China

Tel: 0086 536 7263208 Fax: 0086 536 7263209

E-mail: wfjinli@sina.com Post: 261100

PACKING LIST

TO:

JBM TRADING, INC

INVOICE NO: XL100408

DATE: 2010-4-29

SHIPPED FROM QINGDAO ,CHINA TO NEW YORK, NY

CODE	DESCRIPTION	QUANTITY (CTNS)	GROSS WEIGHT (KGS)	NET WEIGHT (KGS)	Units of Measure
	PLASTIC BAGS 12"X20" ROLL BAGS NET WEIGHT:11.00LB	4157	22000	21600	54
		4157CTNS	22000KGS	21600KGS	54CBM

TOTAL: FOUR THOUSAND ONE HUNDRED AND FIFTY SEVEN CTNS ONLY.

Release container - Yahoo!邮箱

页码, 1/1

YAHOO! 邮箱

Release container

2010年6月3日 周四下午10:29

发件人: "chaomingzhen" <chaomingzhen@163.com>
收件人: "范加一" <sunca3101@yahoo.com.cn>, "wfxj00777"
<wfxj00777@yahoo.com.cn>

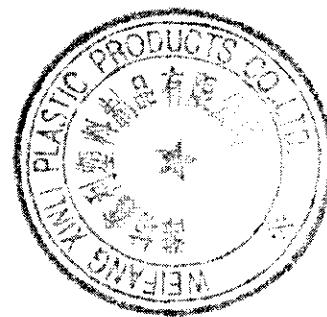
Mr Lee:

Please release the container #uesu4180064 ,Payment you receive within 30 days .Thank You for your support .

chaomingzhen

X Lee 408

网易为中小企业免费提供企业邮箱(自主域名)



SHIPPER/EXPORTER WEIFANG XIMI PLASTIC PRODUCTS CO., LTD ADD: YANGJIABU HANING BOROUGH WEIFANG CITY SHANDONG, CHINA TEL: 86-0536-7263208 FAX: 86-0536-7263209		<u>SUNWORLD INTERNATIONAL LOGISTICS</u>				
		<u>COMBINED TRANSPORT BILL OF LADING</u>				
CONSIGNEE JBM TRADING, INC 1543 74 STREET 1ST FLOOR BROOKLYN NY 11204		BILL OF LADING NO 14000033605	DOCUMENT NO SNGR1005002			
		FOR DELIVERY OF GOODS PLEASE APPLY TO				
NOTIFY PARTY (Complete name and address) JBM TRADING, INC 1543 74 STREET 1ST FLOOR BROOKLYN NY 11204		FORWARDING AGENT-REFERENCES: SUNWORLD USA AGENT				
PRE-CARRIAGE BY:	PLACE OF RECEIPT					
VESSEL/VOYAGE EVER DYNAMIC 0431-069E	PORT OF LOADING QINGDAO	POINT AND COUNTRY OF ORIGIN:				
PORT OF DISCHARGE NEW YORK, NY	PLACE OF DELIVERY NEW YORK, NY	FINAL DESTINATION(FOR THE MERCHANTS REFERENCE ONLY)				
PARTICULARS FURNISHED BY THE MERCHANT						
CONTAINER NO/SEAL NO MARK AND NUMBERS	QUANTITY AND KIND OF PACKAGES	KIND OF PACKAGES DESCRIPTION OF GOOD				
N/M LESU4180064/EMCHEV1948 4157CTNS/23000.00KGS 54CBM/40GP	4157 CTNS CT-CY 1X40' GP FREIGHT COLLECT	SHIPPER'S LOAD COUNT AND SEAL PLASTIC BAGS THIS SHIPMENT CONTAINS NO SOLID WOOD PACKING MATERIALS.				
TELEX RELEASE						
TOTAL NO OF PACKAGES OR CONTAINERS(IN WORDS) SAY FOUR THOUSAND ONE HUNDRED AND FIFTY SEVEN CTNS ONLY						
FREIGHT & CHARGES	RATED AS	RATE	PER			
				PREPAID	COLLECT	LADED ON BORAD THE VESSEL ON BOARD
						PLACE OF B/SYL ISSUE QINGDAO
						NO OF ORIGINAL B/SYL SIGNED
						DATE OF B/SYL ISSUED
DOMESTIC ROTATING EXPORT INSTRUCTIONS/EXPORT				2010-5-12		
RECEIVED by the Carrier the Goods as specified above in apparent good order and condition unless otherwise stated, to be transported to such place as agreed, authorized or permitted herein and subject to all the terms and conditions appearing on the front and reverse of this Bill of Lading to which the Merchant agrees by accepting this Bill of Lading, any local privileges and customs notwithstanding. The particulars given above as stated by the shipper and the weight, measure, quantity, condition, contents, and value of the Goods are unknown to the Carrier.				SIGNED ON BEHALF OF THE CARRIER:		
IN WITNESS whereof three original Bill of Lading has been signed if not otherwise stated below, one of which to be completed the other(s) to be void. If required by the Carrier three original Bills Of Lading must be surrendered duly endorsed in exchange for the Goods or delivery order.				AS AGENT OF THE CARRIER. SINOTRANS EXPRESS INC		

潍坊鑫利塑料制品有限公司
WEIFANG XINLI PLASTIC PRODUCTS CO., LTD

Add: Yangjiabu Hanting Borough Weifang Shandong China

Tel: 0086 536 7263208 Fax: 0086 536 7263209

E-mail: wfjinli@sina.com Post: 261100

INVOICETO:
JBM TRADING,INC

INVOICE NO: XL100505

DATE: 2010-5-11

SHIPPED FROM QINGDAO ,CHINA TO NEW YORK, NY

SAP CODE	STOCK DESCRIPTION	CARTON QUANTITY	PRICE PER CART (USD\$)	ITEM TOTAL USD\$
	PLASTIC BAGS 12"X20" ROLL BAGS NET WEIGHT:12.00LB	1221	8.983	\$10,968.24
	12"X20" ROLL BAGS NET WEIGHT:10.00LB	2936	6.580	\$19,318.88
			SUB TOTAL	\$30,287.12
			INVOICE TOTAL	\$30,287.12

CONTAINER AND SEAL NO.:

TGHU4794729 / EMCHEK9988

1X40' B/L No.: 140000334249

VESSEL / VOY : EVER DYNAMIC V. 0431-069E

潍坊鑫利塑料制品有限公司
WEIFANG XINLI PLASTIC PRODUCTS CO., LTD

Add: Yangjiabu Hanting Borough Weifang Shandong China

Tel: 0086 536 7263208 Fax: 0086 536 7263209

E-mail: wfjinli@sina.com Post: 261100

PACKING LIST

TO:

JBM TRADING,INC

INVOICE NO: XL100505

DATE: 2010-5-11

SHIPPED FROM QINGDAO ,CHINA TO NEW YORK,NY

CODE	DESCRIPTION	QUANTITY (CTNS)	GROSS WEIGHT (KGS)	NET WEIGHT (KGS)	Units of Measure
	PLASTIC BAGS 12"X20" ROLL BAGS NET WEIGHT:12.00LB 12"X20" ROLL BAGS NET WEIGHT:10.00LB	1221			
		2936			
		4157CTNS	22000KGS	21600KGS	54CBM

TOTAL: FOUR THOUSAND ONE HUNDRED AND FIFTY SEVEN CTNS ONLY.

Releasing Containers - Yahoo!邮箱

頁碼, 1/1

YAHOO! 邮箱

Releasing Containers

2010-6-18 11:45

发件人: "chaomingzhen" <chaomingzhen@163.com>
收件人: "艳姐" <sunca3101@yahoo.com.cn>, "wfxj00777" <wfxj00777@yahoo.com.cn>

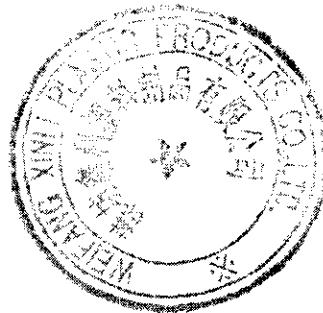
Mr Lee:

Please release the containers# THGU4794729 & # HMCU 1032445. The payments will be made within 30 days. Thank You!

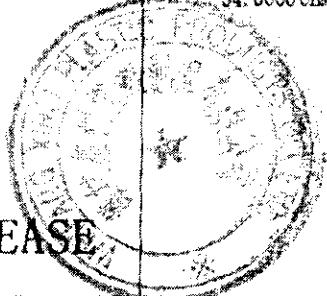
Xiaolei

Chao Ming Zhen

网易为中小企业免费提供企业邮箱(自主品牌)



XL1005

SHIPPER/EXPORTER WEIFANG XINLI PLASTIC PRODUCTS CO., LTD ADD: YANGJIABU HANTING BOROUGH WEIFANG CITY SHANDONG, CHINA TEL: 86-0536-7263208 FAX: 86-0536-7263209		<u>SUNWORLD INTERNATIONAL LOGISTICS</u>				
COMBINED TRANSPORT BILL OF LADING						
CONSIGNEE JBM TRADING, INC 1643 74 STREET 1ST FLOOR, BROOKLYN NY 11204		BILL OF LADING NO 140000334249	DOCUMENT NO SWGP1005013			
		FOR DELIVERY OF GOODS PLEASE APPLY TO				
NOTIFY PARTY (Complete name and address) JBM TRADING, INC 1643 74 STREET 1ST FLOOR, BROOKLYN NY 11204		FORWARDING AGENT-REFERENCES SUNWORLD USA AGENT				
PRE-CARRIAGE BY	PLACE OF RECEIPT					
VESSEL/VOYAGE EVER DYNAMIC 0431-0666	PORT OF LOADING QINGDAO		POINT AND COUNTRY OF ORIGIN			
PORT OF DISCHARGE NEW YORK, NY	PLACE OF DELIVERY NEW YORK, NY		FINAL DESTINATION (FOR THE MERCHANT'S REFERENCE ONLY)			
PARTICULARS FURNISHED BY THE MERCHANT						
CONTAINER NO/SEAL NO MARK AND NUMBERS	QUANTITY AND KIND OF PACKAGES	KIND OF PACKAGES/DESCRIPTION OF GOOD				
N/M TGHU4794729/EMCEK9988 /4157CTNS/22000.000KGS /54CBM/40GP	4157 CTNS CY-CY 1X40' GP FREIGHT COLLECT	SHIPPER'S LOAD COUNT AND SEAL PLASTIC BAGS THIS SHIPMENT CONTAINS NO SOLID WOOD PACKING MATERIALS. 				
TELEX RELEASE						
TOTAL NO OF PACKAGES OR CONTAINERS (IN WORDS) SAY FOUR THOUSAND ONE HUNDRED AND FIFTY SEVEN CTNS ONLY						
FREIGHT & CHARGES	RATED AS	RATE	PER	PREPAID	COLLECT	LADEN ON BOARD THE VESSEL ON BOARD
						PLACE OF B(S)I ISSUE QINGDAO
						NO OF ORIGINAL B(S)I SIGNED
DOMESTIC ROTATION/EXPORT INSTRUCTION/EXPORT				DATE OF B(S)I ISSUED 2010-5-12		
RECEIVED by the Carrier the Goods as specified above in apparent good order and condition unless otherwise stated, to be transported to such place as agreed, authorized or permitted herein and subject to all the terms and conditions appearing on the front and reverse of this Bill of Lading to which the Merchant agrees by accepting this Bill of Lading, any local privileges and customs notwithstanding. The particulars given above as stated by the shipper and the weight, measure, quantity, condition, contents, and value of the Goods are unknown to the Carrier.						SIGNED ON BEHALF OF THE CARRIER:
IN WITNESS whereof three original Bill of Lading has been signed if not otherwise stated below, one of which to be completed the other(s) to be void. If required by the Carrier three original Bills of Lading must be surrendered fully endorsed in exchange for the Goods or delivery order.						AS AGENT OF THE CARRIER, SINOTRANS EXPRESS INC

濰坊鑫利塑料制品有限公司

WEIFANG XINLI PLASTIC PRODUCTS CO., LTD

Add: Yangjiabu Hanting Borough Weifang Shandong China

Tel: 0086 536 7263208 Fax: 0086 536 7263209

E-mail: wfjnlj@sina.com Post: 261100

INVOICE

TO:

INVOICE NO: XI 100508

DATE: 2010-5-14

SHIPPED FROM QINGDAO, CHINA TO NEW YORK, NY

CONTAINER AND SEAL NO.:

EISU1719940 / EMCHDG8198

1X40' B/L No.: 140000380313

VESSEL / VOY : EVER REWARD V. 0432-096E

潍坊鑫利塑料制品有限公司
WEIFANG XINLI PLASTIC PRODUCTS CO., LTD

Add: Yangjiabu Hanting Borough Weifang Shandong China

Tel: 0086 536 7263208 Fax: 0086 536 7263209

E-mail: wfjinli@sina.com Post: 261100

PACKING LIST

TO:

JBM TRADING, INC

INVOICE NO: XL100508

DATE: 2010-5-14

SHIPPED FROM QINGDAO ,CHINA TO NEW YORK,N.Y

CODE	DESCRIPTION	QUANTITY (CTNS)	GROSS WEIGHT (KGS)	NET WEIGHT (KGS)	Units of Measure
	PLASTIC BAGS 12"X20" ROLL BAGS NET WEIGHT:11.00LB 12"X20" ROLL BAGS NET WEIGHT:10.00LB	2210 1946			

TOTAL: FOUR THOUSAND ONE HUNDRED AND FIFTY SIX CTNS ONLY.

来自chaomingzhen@163.com的邮件 - Yahoo! 邮箱

莫高窟

YAHOO! 邮箱

来自chaomingzhen@163.com的数据

发件人: "chaomingzhen" <chaomingzhen@163.com>
收件人: "wfxj00777" <wfxj00777@yahoo.com.cn>、
<sunca310@yahoo.com.cn>

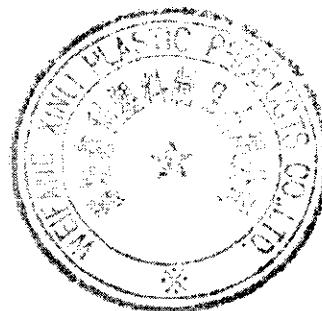
2010年6月15日 08:17:00:000

Mr Lee:

please release the container #eisu1719940. It is arrived today. Payment is made in 30 days. Thank You.
Chao Ming Zhen

图易为中小企业免费提供企业邮箱(自带域名)。

X L 42208



To: 潍坊鑫利
3G-FAX数码传真机, 从此不用耗材!

From

Date: 10-06-17 11:43

SHIPPER/EXPORTER WEIFANG XINLI PLASTIC PRODUCTS CO., LTD ADD: YANGJIABU HANTING BOROUGH WEIFANG CITY SHANDONG, CHINA TEL: 86-0536-7263203 FAX: 86-0536-7261209		SUNWORLD INTERNATIONAL LOGISTICS	
CONSIGNEE JBM TRADING, INC 1643 74 STREET 1ST FLOOR, BROOKLYN NY 11204		COMBINED TRANSPORT BILL OF LADING	
		BILL OF LADING NO. 140000380313	DOCUMENT NO. SWGR1005048
NOTIFY PARTY (Complete name and address) JBM TRADING, INC 1643 74 STREET 1ST FLOOR, BROOKLYN NY 11204		FOR DELIVERY OF GOODS PLEASE APPLY TO FORWARDING AGENT-REFERENCES SUNWORLD USA AGENT	
PRE-CARRIAGE BY:	PLACE OF RECEIPT:		
VESSEL/VOYAGE EVER REWARD 0438 099E	PORT OF LOADING QINGDAO	POINT AND COUNTRY OF ORIGIN	
PORT OF DISCHARGE NEW YORK, NY	PLACE OF DELIVERY NEW YORK, NY	FINAL DESTINATION (FOR THE MERCHANTS REFERENCE ONLY)	
PARTICULARS FURNISHED BY THE MERCHANT			
CONTAINER NO/SEAL NO MARK AND NUMBERS	QUANTITY AND KIND OF PACKAGES	KIND OF PACKAGES DESCRIPTION OF GOOD	MEASUREMENTS(CBM) GROSS WEIGHT(KGS)
N/M EISU1710940/EMCNDG8199 /4156CTNS/22000.000KGS /54CBM/40GP	4156 CTNS CY-CY 1X40' GP FREIGHT COLLECT	SHIPPER'S LOAD COUNT AND SEAL PLASTIC BAGS THIS SHIPMENT CONTAINS NO SOLID WOOD PACKING MATERIALS.	23000.000KGS 54.0000 CBM
TELEX RELEASE			
TOTAL NO OF PACKAGES OR CONTAINERS (IN WORDS): SAY FOUR THOUSAND ONE HUNDRED AND FIFTY SIX CTNS ONLY			
FREIGHT & CHARGES	RATED AS	RATE	PER
			PREPAID
			COLLECT
			LAIDEN ON BOARD THE VESSEL
			ON BOARD
			PLACE OF B/S/A ISSUE QINGDAO
			NO OF ORIGINAL B/S/A SIGNED
			DATE OF B/S/A ISSUED
DOMESTIC ROUTING/EXPORT INSTRUCTION/EXPORT		2010-5-19	
RECEIVED by the Carrier the Goods as specified above in apparent good order and condition unless otherwise stated, to be transported to such place as agreed, authorized or permitted herein and subject to all the terms and conditions appearing on the front and reverse of this Bill of Lading to which the Merchant agrees by accepting this B/L of Lading, any local privileges and customs notwithstanding. The particulars given above as stated by the shipper and the weight, measure, quantity, condition, contents, and value of the Goods are unknown to the Carrier.		SIGNED ON BEHALF OF THE CARRIER:	
IN WITNESS whereof three original Bill of Lading has been signed if not otherwise stated below, one of which (to be completed the others) is to be void. If required by the Carrier three original Bills Of Lading must be surrendered duly endorsed in exchange for the Goods or delivery order.		AS AGENT OF THE CARRIER. SINOTRANS EXPRESS INC	

濰坊鑫利塑料制品有限公司
WEIFANG XINLI PLASTIC PRODUCTS CO., LTD

Add: Yangjiabu Hanting Borough Weifang Shandong China

Tel: 0086 536 7263208 Fax: 0086 536 7263209

E-mail: wsiinli@sina.com Post: 261100

E-mail: Wijman@mathworks.com Post: 261100

INVOICE

TO:
JBM TRADING, INC

INVOICE NO: XL100601

DATE: 2010-6-4

SHIPPED FROM QINGDAO, CHINA TO NEW YORK, NY

CONTAINER AND SEAL NO.:

EMCU1414893 / EMCHEL2698

1X40' B/L No.: 140000495960

VESSEL / VOY : EVER RADIANT V. 0435-015E

潍坊鑫利塑料制品有限公司
WEIFANG XINLI PLASTIC PRODUCTS CO., LTD

Add: Yangjiabu Hanting Borough Weifang Shandong China

Tel: 0086 536 7263208 **Fax: 0086 536 7263209**

E-mail: wfjinli@sina.com Post: 261100

PACKING LIST

TO:

JBM TRADING, INC

INVOICE NO: XL100601

DATE: 2010-6-4

SHIPPED FROM QINGDAO ,CHINA TO NEW YORK,NY

TOTAL: FOUR THOUSAND ONE HUNDRED AND EIGHTY EIGHT CTNS ONLY.

release container - Yahoo! 邮箱

页码, 1/1

YAHOO! 邮箱

release container

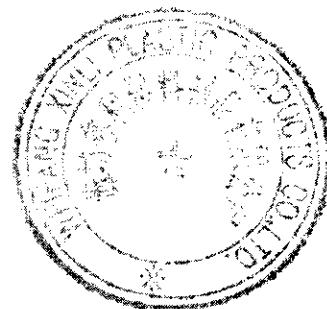
发件人: "chaomingzhen" <chaomingzhen@163.com>
收件人: "wfxj00777" <wfxj00777@yahoo.com.cn>, "鮑姐 'E'"
<suncas3101@yahoo.com.cn>

2010年7月9日 周五 14:12:27

Mr Lee:

Please release container EMCU1414893 that is arrived on 07/10/2010. Payment will made within 30 days. Thank You.

XL[60]
Chao Ming Zhen



•e 乐易通
3G-FAX数码传真机，从此不用耗材！

From:

Date 10-07-12 10:07

SHIPPER/EXPORTER WEIFANG XINLI PLASTIC PRODUCTS CO., LTD ADD: YANJIABU HANTING BOROUGH WEIFANG CITY SHANDONG, CHINA TEL: 86-0536-7266208 FAX: 86-0536-7266208		SUNWORLD INTERNATIONAL LOGISTICS	
CONSIGNEE JBM TRADING, INC 1643 74 STREET 1ST FLOOR, BROOKLYN NY 11204		COMBINED TRANSPORT BILL OF LADING	
		BILL OF LADING NO. 140000495960	DOCUMENT NO. SWCR1006025
		FOR DELIVERY OF GOODS PLEASE APPLY TO:	
NOTIFY PARTY (Complete name and address) JBM TRADING, INC 1643 74 STREET 1ST FLOOR, BROOKLYN NY 11204		FORWARDING AGENT-REFERENCES SUNWORLD USA AGENT	
PRE-CARRIAGE BY:	PLACE OF RECEIPT:		
VESSEL/VOYAGE EVER RADIANT 0435-0158	PORT OF LOADING QINGDAO	POINT AND COUNTRY OF ORIGIN:	
PORT OF DISCHARGE NEW YORK, NY	PLACE OF DELIVERY NEW YORK, NY	FINAL DESTINATION(FOR THE MERCHANTS REFERENCE ONLY)	
PARTICULARS FURNISHED BY THE MERCHANT			
CONTAINER NO/SEAL NO MARK AND NUMBERS	QUANTITY AND KIND OF PACKAGES	KIND OF PACKAGES/DESCRIPTION OF GOOD	
N/M EMCU1414893/EMCHEL2698 /4187CTNS/22000.000KGS /54CBM/40GP	4187 CTNS CY-CY 1X40' GP FREIGHT COLLECT	SHIPPER'S LOAD COUNT AND SEAL PLASTIC BAGS THIS SHIPMENT CONTAINS NO SOLID WOOD PACKING MATERIALS.	
TELEX RELEASE			
TOTAL NO OF PACKAGES OR CONTAINERS(IN WORDS) SAY: FOUR THOUSAND ONE HUNDRED AND EIGHTY SEVEN CTNS ONLY.			
FREIGHT & CHARGES	RATED AS	RATE	PER
			PREPAID
			COLLECT
			LADEN ON BOARD THE VESSEL
			ON BOARD
			PLACE OF B/S/L ISSUE QINGDAO
			NO. OF ORIGINAL B/S/L SIGNED
			DATE OF B/S/L ISSUED
DOMESTIC ROTING/EXPORT INSTRUCTION/EXPORT			
RECEIVED by the Carrier the Goods as specified above in apparent good order and condition unless otherwise stated, to be transported to such place as agreed, authorized or permitted herein and subject to all the terms and conditions appearing on the front and reverse of this Bill of Lading to which the Merchant agrees by accepting this Bill of Lading, any local privileges and customs notwithstanding The particulars given above as stated by the shipper and the weight, measure, quantity, condition, contents, and value of the Goods are unknown to the Carrier			
SIGNED ON BEHALF OF THE CARRIER: AS AGENT OF THE CARRIER. SINOTRANS EXPRESS INC			
IN WITNESS whereof three original Bill of Lading has been signed if not otherwise stated below, one of which to be completed the other(s) to be void. If required by the Carrier three original Bills of Lading must be surrendered duly endorsed in exchange for the Goods or delivery order.			

潍坊鑫利塑料制品有限公司

WEIFANG XINLI PLASTIC PRODUCTS CO. , LTD

Add: Yangjiabu Hanting Borough Weifang Shandong China

Tel: 0086 536 7263208 Fax: 0086 536 7263209

E-mail: wfjinli@sina.com Post: 261100

INVOICE

TO:
JBM TRADING,INC

INVOICE NO: XL100607

DATE: 6/28/2010

SHIPPED FROM QINGDAO ,CHINA TO NEW YORK,NY

SAP CODE	STOCK DESCRIPTION	CARTON QUANTITY	PRICE PER CAR	ITEM
			(USD\$)	TOTAL USD\$
	PLASTIC BAGS 10"X15" ROLL BAGS NET WEIGHT:10.00LB	383	6.350	\$2,432.05
	12"X20" ROLL BAGS NET WEIGHT:10.00LB	3023	6.350	\$19,196.05
	18"X24" ROLL BAGS NET WEIGHT:17LB	532	12.338	\$6,563.82
			SUB TOTAL	\$28,191.92
			INVOICE TOTAL	\$28,191.92

CONTAINER AND SEAL NO.:

FSCU4394299 / EMCHJB1528

1X40' B/L No.: 140000560699

VESSEL / VOY : EVER REACH V. 0438-087E

潍坊鑫利塑料制品有限公司
WEIFANG XINLI PLASTIC PRODUCTS CO. , LTD

Add: Yangjiabu Hanting Borough Weifang Shandong China

Tel: 0086 536 7263208 Fax: 0086 536 7263209

E-mail: wfjinli@sina.com Post: 261100

PACKING LIST

TO:

JBM TRADING, INC

INVOICE NO: XL100607

DATE: 6/28/2010

SHIPPED FROM QINGDAO ,CHINA TO NEW YORK,NY

CODE	DESCRIPTION	QUANTITY (CTNS)	GROSS WEIGHT (KGS)	NET WEIGHT (KGS)	Units of Measure
	PLASTIC BAGS 10"X15" ROLL BAGS NET WEIGHT:10.00LB	383			
	12"X20" ROLL BAGS NET WEIGHT:10.00LB	3023			
	18"X24" ROLL BAGS NET WEIGHT:17LB	532			
		3938CTNS	22000KGS	21600KGS	54CBM

TOTAL: THREE THOUSAND NINE HUNDRED AND THIRTY EIGHT CTNS ONLY.

潍坊鑫利塑料制品有限公司

WEIFANG XINLI PLASTIC PRODUCTS CO. , LTD

Add: Yangjiabu Hanting Borough Weifang Shandong China

Tel: 0086 536 7263208 Fax: 0086 536 7263209

E-mail: wfjml@ sina.com Post: 261100

INVOICE

TO:
JBM TRADING, INC

INVOICE NO: XL100701

DATE: 7/1/2010

SHIPPED FROM QINGDAO ,CHINA TO NEW YORK, NY

SAP CODE	STOCK DESCRIPTION	CARTON QUANTITY	PRICE PER CAR	ITEM
			(USD\$)	TOTAL USD\$
	PLASTIC BAGS 12"X20" ROLL BAGS NET WEIGHT:11.00LB	721	7.983	\$5,755.74
	12"X20" ROLL BAGS NET WEIGHT:10.00LB	1820	6.350	\$11,557.00
	18"X24" ROLL BAGS NET WEIGHT:17.00LB	1173	12.338	\$14,472.47
			SUB TOTAL	\$31,785.22
			INVOICE TOTAL	\$31,785.22

CONTAINER AND SEAL NO.:

LTIU6041285 / EMCHHN2248

1X40' B/L No.: 140000580860

VESSEL / VOY : EVER REFINE V. 0439-082E

潍坊鑫利塑料制品有限公司
WEIFANG XINLI PLASTIC PRODUCTS CO., LTD

Add: Yangjiabu Hanting Borough Weifang Shandong China

Tel: 0086 536 7263208 Fax: 0086 536 7263209

E-mail: wfjinli@sina.com Post: 261100

PACKING LIST

TO:

JBM TRADING, INC

INVOICE NO: XL100701

DATE: 7/1/2010

SHIPPED FROM QINGDAO ,CHINA TO NEW YORK,NY

TOTAL: THREE THOUSAND SEVEN HUNDRED AND FOURTEEN CTNS ONLY.

Exhibit “B”

NYS Department of State

Division of Corporations

Entity Information

The information contained in this database is current through March 25, 2011.

Selected Entity Name: K. M. PACKAGING INC.

Selected Entity Status Information

Current Entity Name: K. M. PACKAGING INC.

Initial DOS Filing Date: MARCH 22, 2004

County: QUEENS

Jurisdiction: NEW YORK

Entity Type: DOMESTIC BUSINESS CORPORATION

Current Entity Status: ACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

K. M. PACKAGING INC.

196-16 67 AVENUE 2FL

FRESH MEADOWS, NEW YORK, 11365

Chairman or Chief Executive Officer

ZHEN, CHAO MING

196-16 67TH AVE

2ND FL

FRESH MEADOWS, NEW YORK, 11365

Principal Executive Office

SHEN, CHAO MING

196-16 67TH AVE

2ND FL

FRESH MEADOWS, NEW YORK, 11365

Registered Agent

NONE

NYS Department of State

Division of Corporations

Entity Information

The information contained in this database is current through June 2, 2011.

Selected Entity Name: KEVIN MULTILINE POLYMER INC.

Selected Entity Status Information

Current Entity Name: KEVIN MULTILINE POLYMER INC.

Initial DOS Filing Date: AUGUST 03, 2006

County: KINGS

Jurisdiction: NEW YORK

Entity Type: DOMESTIC BUSINESS CORPORATION

Current Entity Status: ACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

KEVIN MULTILINE POLYMER INC.

1681 64TH STREET 1FL

BROOKLYN, NEW YORK, 11204-2716

Chairman or Chief Executive Officer

CHAO JIE ZHEN

1681 64TH STREET

1 FLOOR

BROOKLYN, NEW YORK, 11204-2716

Registered Agent

NONE

This office does not record information regarding the names and addresses of officers, shareholders or directors of nonprofessional corporations except the chief executive officer, if provided, which would be listed above. Professional corporations must include the name(s) and address(es) of the initial officers, directors, and shareholders in the initial certificate of incorporation, however this

Exhibit “C”

NYS Department of State

Division of Corporations

Entity Information

The information contained in this database is current through June 2, 2011.

Selected Entity Name: JBM TRADING INC.

Selected Entity Status Information

Current Entity Name: JBM TRADING INC.

Initial DOS Filing Date: AUGUST 06, 2009

County: KINGS

Jurisdiction: NEW YORK

Entity Type: DOMESTIC BUSINESS CORPORATION

Current Entity Status: INACTIVE - Dissolution (May 23, 2011)

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

JBM TRADING INC.

1643 74TH STREET 1ST FLOOR

BROOKLYN, NEW YORK, 11204

Registered Agent

NONE

This office does not record information regarding the names and addresses of officers, shareholders or directors of nonprofessional corporations except the chief executive officer, if provided, which would be listed above. Professional corporations must include the name(s) and address(es) of the initial officers, directors, and shareholders in the initial certificate of incorporation, however this information is not recorded and only available by viewing the certificate.

*Stock Information